

**IN THE UNITED STATES COURT OF APPEALS
FOR THE FOURTH CIRCUIT**

UNITED STATES

Appellee,

v.

EGHOSASERE AVBORAYE-IGNINEDION

Appellant

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No. 23-4600

MOTION TO WITHDRAW

Alfred Guillaume III, Law Offices of Alfred Guillaume III, LLC,
respectfully requests that this Court allow counsel to withdraw. In support of this
Motion, counsel states as follows:

1. On November 21, 2024, this Court issued an unpublished *per curiam* opinion affirming the district court's decision.
2. On November 21, 2024, counsel wrote to Appellant informing him of his right to file for Certiorari in the United States Supreme Court. Counsel additionally informed him that in his opinion there were no non-frivolous issues to be raised before the Supreme Court. Lastly, counsel notified him of his intent to withdraw and informed him that he had seven (7) calendar days to respond, should he choose to do so.
3. On November 21, 2024, undersigned counsel *served a* copy of the

Certiorari Status Form on the defendant. Counsel *filed* the Certiorari Status Form on December 23, 2024.

4. In the opinion of counsel, and in accordance with Local Rule 46(d), a certiorari petition would be frivolous.

5. In light of the foregoing, and the fact that counsel believes that there are no non-frivolous issues, counsel respectfully requests that this Honorable Court allow him to withdraw.

WHEREFORE, counsel requests that he be permitted to withdraw as counsel for Mr. Keno Brown

Respectfully Submitted,

Alfred Guillaume

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CERTIFICATE OF SERVICE

I hereby certify that on this day, December 23, 2024, a copy of the foregoing was served on the parties via ECF and mailed to Mr. Brown with proper postage affixed.

Alfred Guillaume

Alfred Guillaume III
